

SHARTSIS FRIESE LLP
ONE MARITIME PLAZA
EIGHTEENTH FLOOR
SAN FRANCISCO, CA 94111-3598

SHARTSIS FRIESE LLP
JOSEPH V. MAUCH (Bar #253693)
jmauch@sflaw.com
One Maritime Plaza, Eighteenth Floor
San Francisco, CA 94111-3598
Telephone: (415) 421-6500
Facsimile: (415) 421-2922
ljacobs@sflaw.com
jmauch@sflaw.com

McANDREWS, HELD & MALLOY, LTD.
Peter J. McAndrews
James P. Murphy
Anna M. Targowska
500 West Madison Street, 34th Floor
Chicago, Illinois 60661
(312) 775-8000
pmcandrews@mcandrews-ip.com

Attorneys for Plaintiff
TQ DELTA, LLC

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**IN RE SUBPOENAS TO
QUALCOMM AETHEROS, INC.**

Served in related cases:

TQ Delta v. Pace Americas, LLC, et al.,
Case No. 13-cv-1835-RGA (D. Del.);

TQ Delta v. Zhone Technologies, Inc.,
Case No. 13-cv-1836-RGA (D. Del.);
and

*TQ Delta v. ZyXEL Communications,
Inc.*, et al., Case No. 13-cv-02013-RGA
(D. Del.)

Case No. 3:16-cv-01926-CAB-NLS

**PLAINTIFF TQ DELTA LLC'S
NOTICE OF MOTION AND
MOTION TO FILE DOCUMENTS
UNDER SEAL**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and the User Manual regarding How to File Civil Sealed Documents published by the District Court for the Southern District of California, Plaintiff TQ Delta LLC (“TQ Delta”) hereby moves to file the following documents under seal:

1. Exhibit 10 to the Declaration of Anna Targowska in Support of Motion to Compel Out of District Subpoenas to Qualcomm Atheros, Inc. [Dkt. No. ____] (“Targowska Declaration”);
2. Exhibit 11 to the Targowska Declaration;
3. Exhibit 12 to the Targowska Declaration;
4. Ex. 29 to the Targowska Declaration;
5. Ex. 49 to the Targowska Declaration; and
6. Ex. 52 to the Targowska Declaration.

This motion is based on this Notice, the Memorandum of Points and Authorities, the Declaration of Anna Targowska, submitted concurrently herewith, and any matters this Court may or must judicially notice.

Respectfully submitted,

Dated: August 1, 2016

SHARTSIS FRIESE LLP

/s/ Joseph V. Mauch

By JOSEPH V. MAUCH

:
McANDREWS, HELD & MALLOY,
LTD.

Peter J. McAndrews
James P. Murphy
Anna M. Targowska
500 West Madison Street, 34th Floor
Chicago, Illinois 60661
(312) 775-8000
pmcandrews@mcandrews-ip.com

Attorneys for Plaintiff
TQ DELTA, LLC

10250\001\7791958.v1